

Via ECF Hon. Paul G. Gardephe United States District Judge **United States District Court** Southern District of New York 500 Pearl Street New York, NY 10007

March 24, 2021

MEMO ENDORSED:

The summary judgment briefing schedule (Dkt. No. 86) is extended by thirty days. Any summary judgment motion by Defendant is due May 17, 2021; Plaintiff's opposition is due June 16, 2021; and any reply by Defendant is due June 28, 2021.

SO ORDERED.

Paul G. Gardephe

United States District Judge

Dated: March 25, 2021

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Re: Ramnarine v. Bronx Psychiatric Center, et al., 16-cv-0479 (PGG)(GWG)

Dear Judge Gardephe:

Pursuant to Your Honor's February 22nd order (ECF 86), the parties in the above-referenced case jointly submit this letter to provide Your Honor with an update as to the status of settlement negotiations. The parties further jointly request a stay of the summary judgment scheduling order (*Id.*) or, in the alternative, an extension of time.

The parties have made significant and meaningful progress toward a settlement, defining and working toward agreement upon key terms. We anticipate that Defendant will seek approval of a proposed settlement within the next few weeks.

For this reason, we request a stay, sine die, of the scheduling order for Defendant's Motion for Summary Judgment.

Thank you for your consideration.

Respectfully,

/s/Samantha Iones Samantha James Limited Pro Bono Counsel for Plaintiff

/s/Carrie Windland Carrie Windland Assistant Attorney General Counsel for Defendant